

Exhibit A

83D9EXPH

P. Perez - redirect

1 So I'll have to get another date.

2 MR. PERGAMENT: Can I have a side bar with your Honor
3 and Mr. Gentile for one second.

4 THE COURT: On the record or off the record?

5 MR. PERGAMENT: Off the record, your Honor, please.

6 Thank you.

7 (Discussion held off the record).

8 MR. PERGAMENT: Judge, I'll just have Ms. Perez come
9 in.

10 THE COURT: Yes. Please. I want this done in her
11 presence and Pablo Perez as well.

12 As a result of the hearing this morning, the parties
13 discussions with one another, I understand they have a
14 settlement they want to enter into on the record.

15 MR. GENTILE: The plaintiff was seeking, in punishment
16 for the contempt in this matter, forfeiture of the bond, which
17 is a 50,000-dollar bond.

18 The defendants have agreed that in order to resolve
19 these proceedings in this matter, that they will pay that
20 \$50,000 in the following manner.

21 They will pay \$27,500, as soon as that is released,
22 from the bond; that the balance of it will be paid at \$2,500 a
23 month until -- for a nine-month period until that brings up the
24 total payments to the plaintiff of \$50,000 for the contempt;
25 and that the bond remain in place for the balance until it is

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1 paid off. And that if the defendant fails to make payment on a
2 monthly basis, then the balance of the bond will be forfeited
3 to reach the total of \$50,000.

4 In addition, the defendant will consent and -- by
5 consent to a judgment in the full amount of this claim plus
6 interest and reasonable attorneys' fees so that a motion need
7 not be made by default to be submitted to the Court within, I
8 would say, the next seven days, so that we have that entered.
9 And that would resolve the entire case.

10 THE COURT: The judgment will be entered against whom?

11 MR. GENTILE: It would be against the two defendants,
12 Los Compadres and the principal of the company, Josefa Perez.

13 THE COURT: Not Pablo?

14 MR. GENTILE: I haven't -- if I may have just one
15 second. Yes.

16 THE COURT: Yes.

17 (Pause)

18 MR. PERGAMENT: Your Honor, if I may, Mr. Gentile was
19 discussing what was discussed. I have to sit and talk with
20 Mr. Perez about that. I can't -- that was not something I
21 discussed with him, honestly, outside.

22 I only discussed fully resolving this matter on the
23 terms Mr. Gentile explained, with one slight caveat that he
24 agreed to was the first payment would be May 15, would be a
25 two-month window. This other issue he just raised, I haven't

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1 conferred with my client about.

2 MR. GENTILE: What I've asked is for -- that he
3 consent to Pablo being added as a defendant to the matter.

4 THE COURT: I think he's going to be -- I would think
5 he ought to be on this because he's, obviously, a control
6 person under the Packer statute.

7 MR. PERGAMENT: I understand. It's something I have
8 to explain to them.

9 THE COURT: Please talk to them.

10 MR. PERGAMENT: I just can't do it without confirming.

11 THE COURT: I thought he was coming in.

12 MR. PERGAMENT: He is here, but I don't think he
13 understands what we just --

14 THE COURT: Ask him.

15 MR. PERGAMENT: I will, Judge.

16 Your Honor, we have --

17 MR. GENTILE: Leading off where we finished, Judge, in
18 addition to what we've just told to you, we inform the Court:
19 Pablo Perez will consent to a consent order adding his name as
20 a named defendant to the action; and that judgment be entered
21 against him as well as Josefa Perez for the full amount, plus
22 interest, plus attorneys' fees. And that the defendant has
23 agreed to reduce the monthly payments from \$2,500 a month to
24 \$1,250 a month starting May 15, which will be paid until the
25 full amount, the \$50,000 is received. And that amount is to be

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1 backed up by the security bond until full payment is made.

2 THE COURT: Let me see if I understand that. Prior to
3 this, 27,500 was going to be paid by the 15th of May, and
4 then the balance was going to be paid, \$2,500 over nine months.

5 MR. GENTILE: Actually the 27,500 should be sooner
6 than that --

7 THE COURT: 27,500 will be paid at the earliest
8 possible opportunity.

9 The balance of 22,500, which was going to be paid off
10 at 2,500 a month over nine months, is now \$1,250 over 18
11 months.

12 MR. GENTILE: That's correct, your Honor.

13 THE COURT: And in return -- and also in addition, a
14 judgment will run against both Josefa and Pablo Perez for the
15 full amount of the outstanding amount, plus interest, and
16 attorneys' fees.

17 MR. GENTILE: That's correct, your Honor. And in
18 order to accomplish that, Pablo Perez, through counsel, is
19 consenting to adding his name to the --

20 THE COURT: The style of the action.

21 MR. GENTILE: Yes, your Honor, so that judgment may be
22 entered against all defendants for that.

23 We'd ask that this particular agreement that we've
24 made be reduced to a consent order so that.

25 THE COURT: I think that's always the best way to

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1 proceed.

2 Mr. Pergament, you've heard the settlement terms?

3 MR. PERGAMENT: Yes, your Honor.

4 THE COURT: Do you agree?

5 MR. PERGAMENT: Yes, your Honor.

6 THE COURT: And Ms. Perez, you've heard them as well.

7 Do you agree?

8 MS. PEREZ: Yes.

9 THE COURT: And Mr. Perez, Pablo Perez, you've heard
10 the terms of the deal as well.

11 Do you agree, sir?

12 MR. PEREZ: Yes.

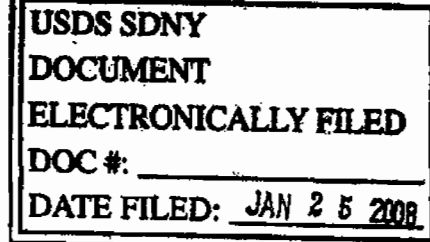
13 THE COURT: Anything else we should do?

14 MR. PERGAMENT: Thank you, your Honor.

15 THE COURT: Thank you very much.

16 (Adjourned)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



-----X
EXP GROUP, LLC :

Plaintiff, :

07 CV 9847 (PAC)

-against- :

ORDER

LOS COMPADRES PRODUCTS CORPS :
and JOSEFA F. PEREZ, :

Defendants. :

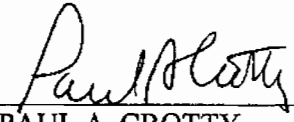
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HONORABLE PAUL A. CROTTY, United States District Judge:

In accordance with the hearing conducted on January 24, 2007, the order of this Court dated January 17, 2008 is modified as follows. It is hereby **ORDERED** that the U.S. Marshals of the Southern District of New York release Ms. Perez from their custody when a bond in the amount of \$50,000.00 has been posted with the Clerk of Court. Upon posting of the bond, Ms. Perez is ordered to deliver her passport to the custody of the U.S. Marshals where it shall remain until further notice. The \$50,000.00 bond will secure Ms. Perez' continued appearance before the court, and the performance of the terms of the Amended Injunction issued on November 16, 2007. The November 16, 2007 Amended Injunction will be enforced, and the Court will monitor its compliance until the next scheduled hearing date of February 5, 2008 at 11:00 in Courtroom 20-C.

Dated: New York, New York
January 25, 2008

SO ORDERED.



PAUL A. CROTTY
United States District Judge